



A Commitment To Excellence

QA
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Tri-State Motor Transit Co.
Post Office Box 113
Joplin, Missouri 64602
417 624 3131

August 12, 1993

FHWA Docket No. MC 92-4
Room 4232
HCC-10
Office Of The Chief Council
Federal Highway Administration
400 Seventh Street SW
Washington, DC 20590

FHWA-97-2180-16

88 AUG 15 ALL: 07
FED. H. W. A.
U.S. DEPT. OF TRANSPORTATION

To Whom It May Concern:

Tri-State Motor Transit Co. supports the Federal Highway Administration proposed rule making in FHWA Docket No. MC-92-4. Tri-State does however wish to submit for review the following comments. If the intent of this rule making is to enhance safety, then it is our position that the sooner the program is expanded to cover all hazardous materials the more effect it will have in reaching this goal.

FHWA is recommending a three year phase in period to ease the economic burden for industries such as explosive magazine operators, quarry operators, farmers, and persons involved in fireworks displays. With the lack of regulatory enforcement on these industries and their track record with regard to explosives handling incidents, we feel that the three year phase in period should absolutely not be extended and serious consideration should be given to reducing this time period.

With regard to the proposed inspection requirements for highway route control quantities of radioactive material, we agree with the FHWA proposal of utilizing Part 396, Appendix G to Subchapter B, "Minimum Periodic Inspection Standards" to meet the inspection criteria. However, since it would be beyond the scope of any carrier to have an inspector available immediately prior to any shipment of HRCQ commodities, due to the fact most carriers do not have terminals located adjacent to shippers of HRCQ, we suggest that the burden of the safety inspection be put upon the shipper. In order to simplify this burden and procedures, we further suggest the adoption of a form similar in nature and composition to the approved DOD Inspection Form 636. (copy attached)

FHWA DOCKET MC-92-4-17
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This is a widely accepted Form and has been in use a number of years and we believe it meets all the criteria and would be easily adaptable to the FHWA proposal for inspection. To require the carrier to perform the inspection would cause a great financial burden that would have to be passed to the shipper and be unrealistic.

Again, Tri-Slate supports the proposed rule making as we feel it will further the cause of safety on our nations highways. Should you have any questions, please contact the undersigned at (417) 624-3131

Sincerely,

TRI-STATE MOTOR TRANSIT CO.

A handwritten signature in black ink, appearing to read "Jeff Cooney". The signature is fluid and cursive, with the first name "Jeff" and last name "Cooney" clearly distinguishable.

Jeff Cooney
Director
Safety & Security

JC:ar

MOTOR VEHICLE INSPECTION (TRANSPORTING HAZARDOUS MATERIAL)

SEL. NO.	ORIGIN	DESTINATION
NAME OF CARRIER		
NAME OF DRIVER		
DATE AND HOUR		
INSTALLATION/ACTIVITY		
DRIVER'S STATE PERMIT NO.		
MEDICAL EXAMINER'S CERTIFICATE AND DATE		

VEHICLE

TYPE OF VEHICLE <input type="checkbox"/> TRUCK <input type="checkbox"/> TRUCK AND FULL TRAILER <input type="checkbox"/> TRACTOR AND DOUBLE TRAILERS <input type="checkbox"/> TRACTOR AND CLOSED SEMI-TRAILER <input type="checkbox"/> TRACTOR AND FLAT-BED TRAILER	TRUCK NUMBER ORIGIN DESTINATION	TRAILER NUMBER ORIGIN DESTINATION	SLEEPER CAB <input type="checkbox"/> YES <input type="checkbox"/> NO VALID LEASE <input type="checkbox"/> YES <input type="checkbox"/> NO I.C.C. NUMBER
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NOTE: All of the following items shall be checked on empty equipment prior to loading. Items with an asterisk(*) shall be checked on incoming loaded equipment.

ITEM NO.	CHECK APPROPRIATE COLUMN (See reverse side for explanatory notes)	ORIGIN		DESTINATION		REMARKS (Explain unsatisfactory items; use reverse side if necessary)
		SAT	UNSAT	SAT	UNSAT	
1.	ENGINE, BODY, CAB AND CHASSIS CLEAN					
2.	STEERING MECHANISM					
3.	HORN OPERATIVE					
4.	WINDSHIELD AND WIPERS					
5.	SPARE ELECTRIC FUSES AVAILABLE					
6.	REAR VIEW MIRRORS INSTALLED					
7.	HIGHWAY WARNING EQUIPMENT					
8.	FULL FIRE EXTINGUISHER INSTALLED					
9.	LIGHTS AND REFLECTORS OPERATIVE					
10.	EXHAUST SYSTEM					
* 11.	LIQUID PETROLEUM GAS POWERED VEHICLES					
* 12.	FUEL TANK, LINE AND INLET					
13.	COUPLING DEVICES - KINGPIN LOCK					
* 14.	ALL BRAKES OPERATIVE					
* 15.	LANDING GEAR ASSEMBLY OPERATIVE					
16.	SPRINGS AND ASSOCIATED PARTS					
* 17.	TIRES					
18.	CARGO SPACE					
* 19.	ELECTRIC WIRING					
* 20.	TAIL GATE AND DOORS SECURED					
* 21.	FIRE AND WATER RESISTANT TARPULIN					
22.	ANY OTHER DEFECTS (Specify)					

☐ APPROVED (If rejected give reasons on reverse under "Remarks". Equipment shall be approved if deficiencies are corrected prior to loading.)
☐ REJECTED

SIGNATURE (of Inspector)
ORIGIN

SIGNATURE (of Inspector)
DESTINATION

ITEMS TO BE CHECKED PRIOR TO RELEASE OF LOADED VEHICLE		ORIGIN	DESTINATION
23.	MIXTURES OF MATERIAL PROHIBITED BY DOT REGS. ARE NOT LOADED ONTO THIS VEHICLE		
* 24.	LOAD IS SECURED TO PREVENT MOVEMENT		
25.	WEIGHT IS PROPERLY DISTRIBUTED AND VEHICLE IS NOT OVERWEIGHT		
* 26.	SEALING APPLIED TO CLOSED VEHICLE. FIRE AND WATER RESISTANT TARPULIN APPLIED ON OPEN VEHICLE		
* 27.	SPECIAL INSTRUCTIONS (DD Form 636) FURNISHED DRIVER 836		
* 28.	COPY OF VEHICLE INSPECTION (DD Form 636) FURNISHED DRIVER		
* 29.	PROPER PLACARDS APPLIED		
* 30.	SHIPMENT MADE UNDER DOT EXCEPTION 600		

SIGNATURE (of Inspector) ORIGIN

SIGNATURE (of Driver) ORIGIN

SIGNATURE (of Inspector) DESTINATION

SIGNATURE (of Driver) DESTINATION

DD FORM 626
1 APR 78

USE PREVIOUS EDITIONS OF THIS FORM, WHICH IS OBSOLETE.

U102-LF-000-6260

No longer required for Commercial motor per MTRC
Mag. dated 5 Jan 93.